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August 8, 2017

VIA ECF

Honorable Robert M. Levy
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Yolanda Gattling v. City of New York, et al., 15-CV-3761 (JBW)(RML)

Your Honor:

I am the attorney assigned to the defense of the above-referenced matter, and the parties write to jointly request that discovery be extended an additional 60 days, from August 9, 2017, to October 9, 2017. This is the fourth request that the discovery period will have been extended, although the first time defendants have participated in such a request.

There are several reasons for the proposed enlargement. First, I have only recently been recently reassigned the case from Deborah Mbabazi, and have needed time to review the file and get up to speed. Secondly, while the parties have been engaged in the document review of defendant Madhu's disciplinary history, and defendants have produced the bulk of outstanding documents, there are still some disciplinary files that must still be produced, and the deposition of Defendant Madhu remains outstanding. The proposed enlargement will provide ample time to complete all outstanding discovery. Third, I am informed by plaintiff's counsel that in the coming weeks he is likely to be away for large blocks of time. Finally, I am also likely to take a vacation at the end of August. Neither party will be prejudiced by the proposed enlargement.

I thank the Court for its consideration of this request.

Respectfully submitted,

/s/

Michael K. Gertzer
Senior Counsel
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cc: John Paul DeVerna, Esq. (Via ECF)
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